7/7/00-3082

UNITED STATES MARINE CORPS
MARINE CORPS BASE
PSC BOX 20004
CAMP LEJEUNE, NORTH CAROLINA 28542-0004

IN REPLY REFER TO:
6286
BEMD

07 JUL 2000

Mr. David Lown, LG, PE
North Carolina Department of Environment
and Natural Resources
Division of Waste Management
Suite 150
401 Oberlin Road
Raleigh, North Carolina 27605

Dear Mr. Lown:

The purpose of this letter is to address issues concerning the Solid Waste Management Unit (SWMU) program at Marine Corps Base (MCB), Camp Lejeune. Baker Environmental completed the Phase I SWMU Confirmatory Sampling Report in October 1998. This report recommended remedial actions and/or institutional controls at SWMU 291, SWMU 299, SWMU 310, and SWMU 339. These recommendations are either completed or contracts to complete the recommendations have been initiated. SWMU 358, a new SWMU, has been added to the program. It requires a removal action to prevent the release of contaminants to the environment.

For SWMU 291 – 034 Ditch, the Phase I Report recommended . . . "sediment within the ditch be removed and the ditch be backfilled to prevent accumulation of surface water." MCB Camp Lejeune initiated a contract to delineate the contaminated area, remove the contaminated soil, and backfill the area to prevent surface water accumulation.

For SWMU 299 – AS 114 Aboveground Storage Tank MCAS Auto Hobby Shop, the Phase I Report recommended, . . . "institutional /engineering controls such as secondary containment or overfill prevention measures should be implemented." The tank exterior and overfill containment have been cleaned. Surrounding contaminated soil has been removed and replaced with clean soil. Procedures have been established to collect POLs in a small portable container within the shop area, which will subsequently be emptied into the AST by employees of the hobby shop rather than patrons. Future plans involve relocating the AST to an adjacent concrete pad and constructing a secondary containment system. Enclosure 1 is the POA&M for the action.

For SWMU 310 – PT33 Pond Oil Water Separator, the Phase I Report recommended, . . ."the quart-sized oil containers (observed during inspection) should be removed and properly disposed. Access to these pits should be restricted to prohibit the disposal of hazardous materials in the pits." TJC Engineering removed the concrete pits in August 1998. Subsequent sampling indicated trichloroethene contamination beneath the former concrete pits. Sampling results are in enclosure 2. MCB Camp Lejeune initiated a contract to delineate the

contaminated area, remove the contaminated soil, and regrade the area. Because the SWMU is closed, the institutional controls for limiting site access are not required.

For SWMU 339 – AS4146 Sandblasting Area, a recommendation was presented that controls are needed to prevent the migration of contaminated sand and grit to the storm-water collection system. A high-pressure baking soda paint remover has replaced the former sand blasting method. A new wash rack and associated oil/water separator (O/WS) have been constructed. Enclosure 3 is the design for the new O/WS. Paint stripping with the baking soda method is now being used at the new O/WS, which collects runoff and discharges into the sanitary sewer.

SWMU 358 – Sneads Ferry Road Battery Dump was discovered on May 8, 2000. The site is located near the intersection of Main Service Road and Sneads Ferry Road and lies northeast of MCB Camp Lejeune's soil borrow pit. The area is clear of vegetation and is primarily a sandy geology. The SWMU was initially reported to Environmental Compliance Division (ECD) by a jogger who saw a few batteries. Upon inspection, ECD contacted the Resource Conservation and Recovery Branch who then filled two 55-gallon drums with batteries. Enclosure 4 contains photographs from the ECD inspection. At this point, the Installation Restoration Division was alerted and began the notification/remediation procedures established in MCB Camp Lejeune's RCRA Hazardous Waste Management Permit. A letter of notification was sent to the North Carolina Department of Environment and Natural Resources and the Environmental Protection Agency Region IV. SWMU 358 encompasses an area approximately 15 feet long by 20 feet wide and extends to an estimated depth of 6-8 feet. It contains an undetermined quantity of lithium, magnesium, and nickel-cadmium batteries. Historically, battery dumps aboard Camp Lejeune contain between 150-200 tons of batteries. The affected area has been fenced off and the borrowing pit operator notified to prevent any intrusive activities at the SWMU. In order to prevent further releases of contaminants to the environment, MCB Camp Lejeune plans on performing a RCRA Interim Measure (IM) to remove the batteries and associated soil. MCB Camp Lejeune has initiated contract negotiations for this IM. The IM Work Plan will provide procedures for battery/soil removal and disposal. It will also include a confirmatory sampling plan that will delineate any further contamination in the area.

For additional information, the point of contact is Mr. Thomas Burton, Installation Restoration Division, Environmental Management Department, at telephone (910) 451-5068.

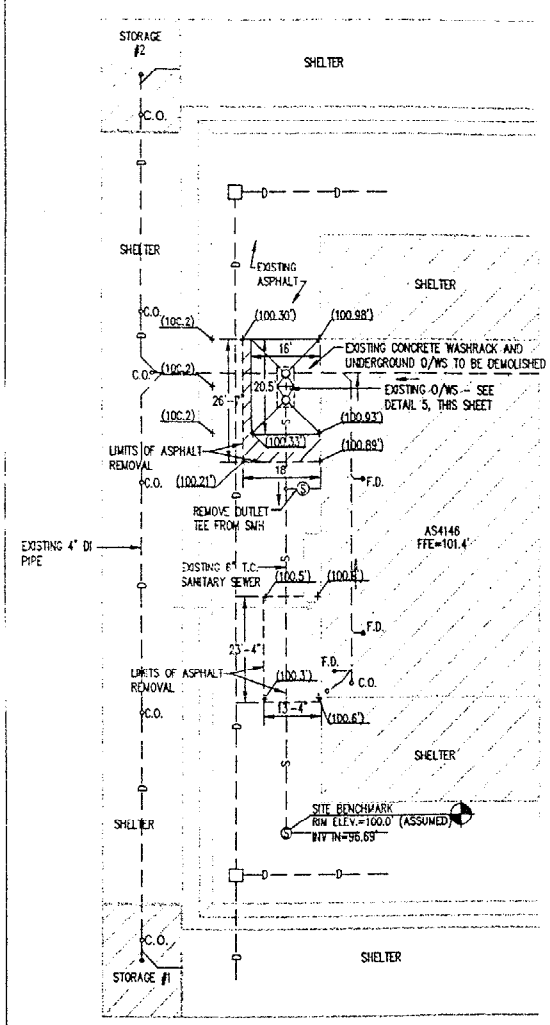
Sincerely,

SCOTT A. BREWER, PE
Deputy Assistant Chief of Staff
Environmental Management
By direction of
the Commanding General

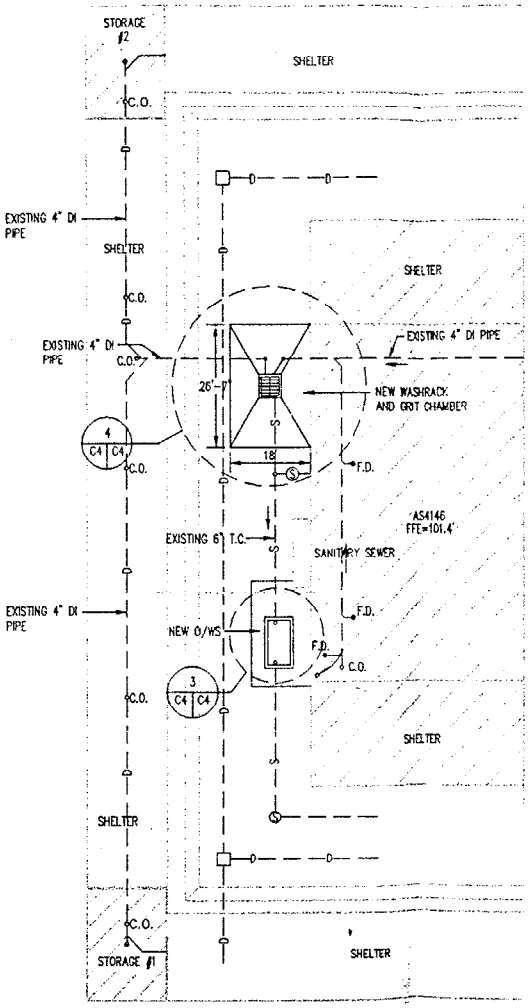
Enclosures: 1. POA&M for SWMU 299
2. SWMU 310 Post-Closure Analytics
3. SWMU 339 O/WS Design Plans
4. Photographs of SWMU 358

Copy to:
Mr. Blackwell, Atlantic Division, NAVFACENG
Ms. Rossi, NCDENR-WRO
Ms. Townsend, EPA
Mr. Bonnelli, BAKER
Mr. Bailey, CH_2M Hill

REVISIONS			
SYM		DATE	APPROVED

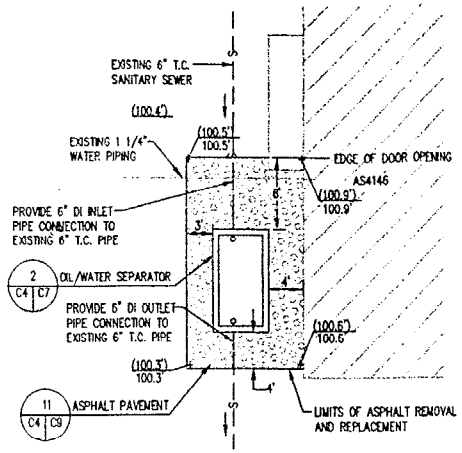


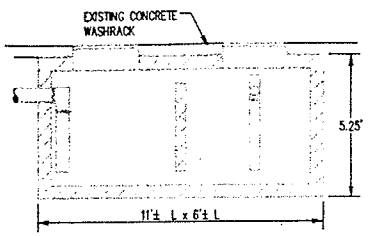
DEMOLITION PLAN



NEW CONSTRUCTION PLAN

B | C1 | C4 — SITE AS4146 SCALE: 1"=20'





SECTION

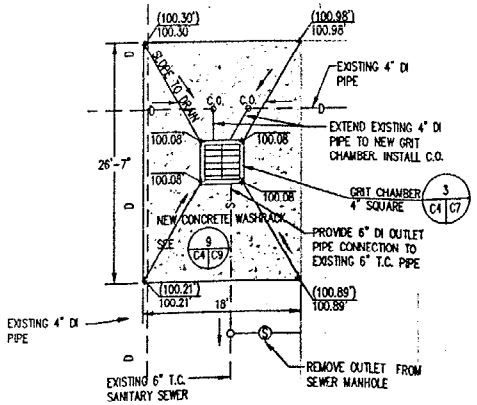
DEMOLITION NOTES

1. COORDINATE THE FINAL PUMPING OF THE O/WS WITH THE CONTRACTING OFFICER. FINAL PUMPING TO BE COMPLETED BY THE GOVERNMENT.
2. AT THE TIME OF FINAL PUMPING, THE CONTRACTOR SHALL STEAM CLEAN INTERIOR SURFACES OF THE O/WS.

5 | C4 | C4 EXISTING O/WS NOT TO SCALE

NOTE: PROVIDE TEMPORARY BYPASS LINE AROUND NEW O/WS TO MAINTAIN EXISTING FACILITY IN OPERATION. UPON FINAL CONSTRUCTION, DEMOLISH BYPASS LINE AND DIRECT ALL FLOW THROUGH THE NEW O/WS.

3 | C4 | C4 ENLARGED PLAN - O/WS AREA SCALE: 1"=10'

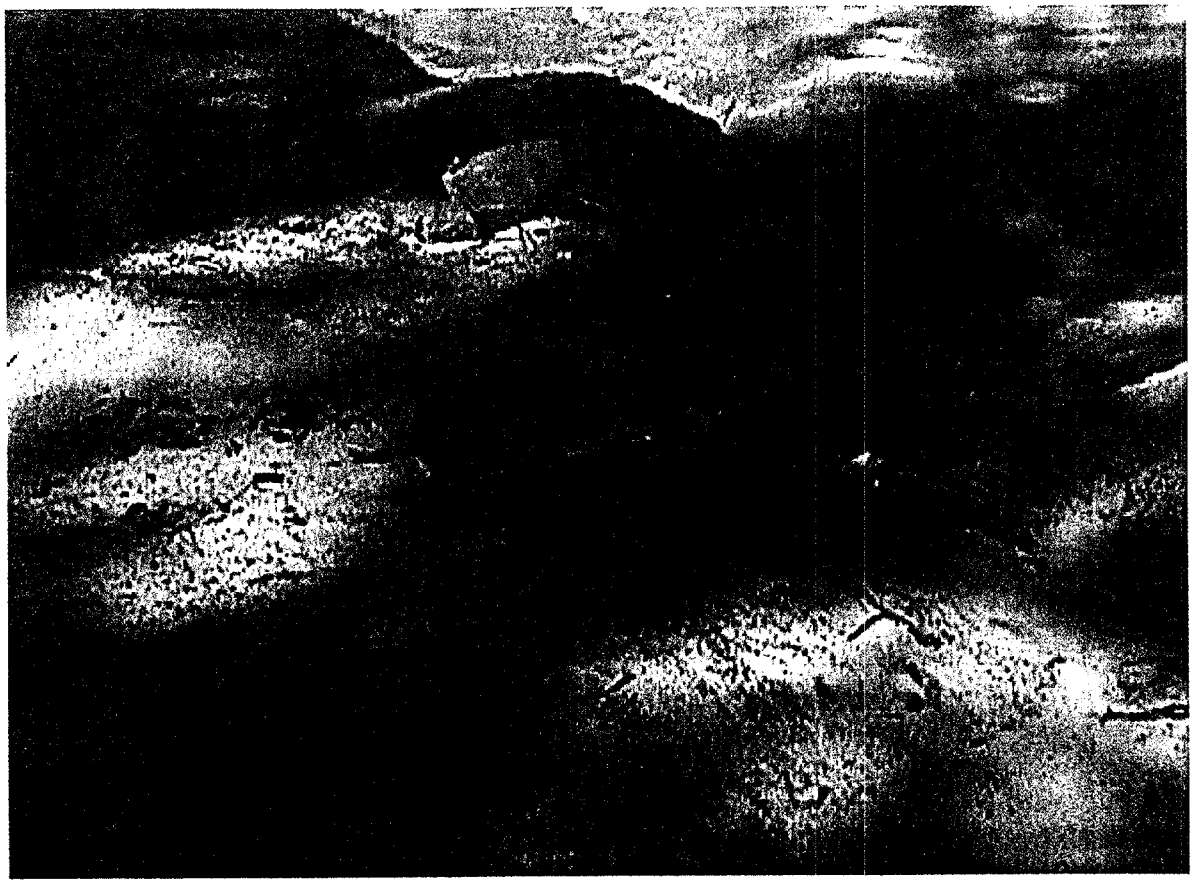


4 | C4 | C4 ENLARGED PLAN - WASHRACK AREA SCALE: 1"=10'

SUMMARY OF WORK

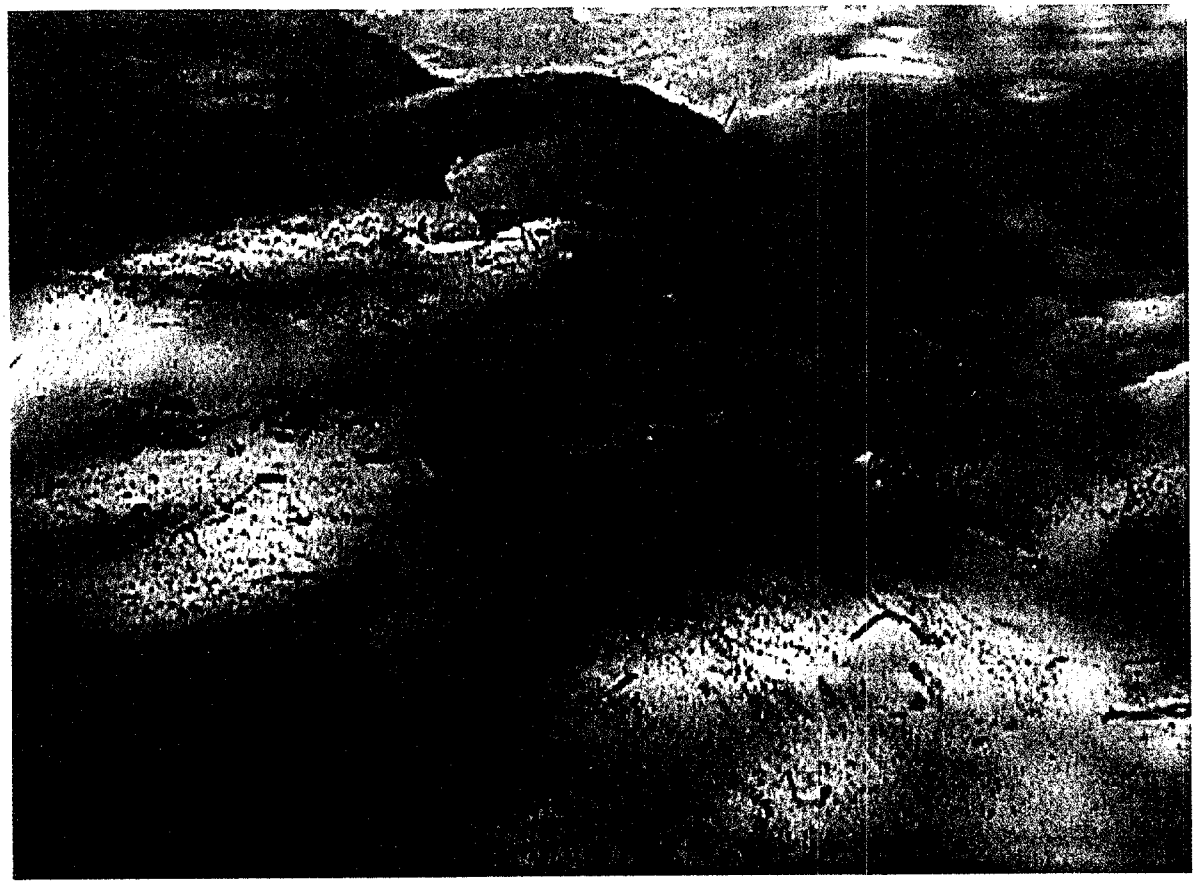
1. DEMOLISH EXISTING CONCRETE WASHRACK AND UNDERGROUND O/WS.
2. SAWCUT AND REMOVE PAVEMENT AS INDICATED.
3. REMOVE OUTLET TEE FROM EXISTING SEWER MANHOLE.
4. CONSTRUCT NEW WASHRACK AND GRIT CHAMBER.
5. CONSTRUCT NEW O/WS.
6. EXTEND/CONNECT EXISTING PIPING TO NEW STRUCTURES.

ENCLOSURE (3)



- The illegal battery dumpsite is located at the northeast corner of the burrow pit adjacent to Sneads Ferry Rd at the DC training area.
- Type of batteries in the sit are:
    (1) Lithium Batteries
    (2) Magnesium Batteries
- The estimated time of the dump is mid 1980s to late 1980s.
- The size of the site is approximately 36 sq. ft. or larger. The exact size is undetermined
- Quantity of batteries are undetermined

ENCLOSURE (4)



ENCLOSURE (4)

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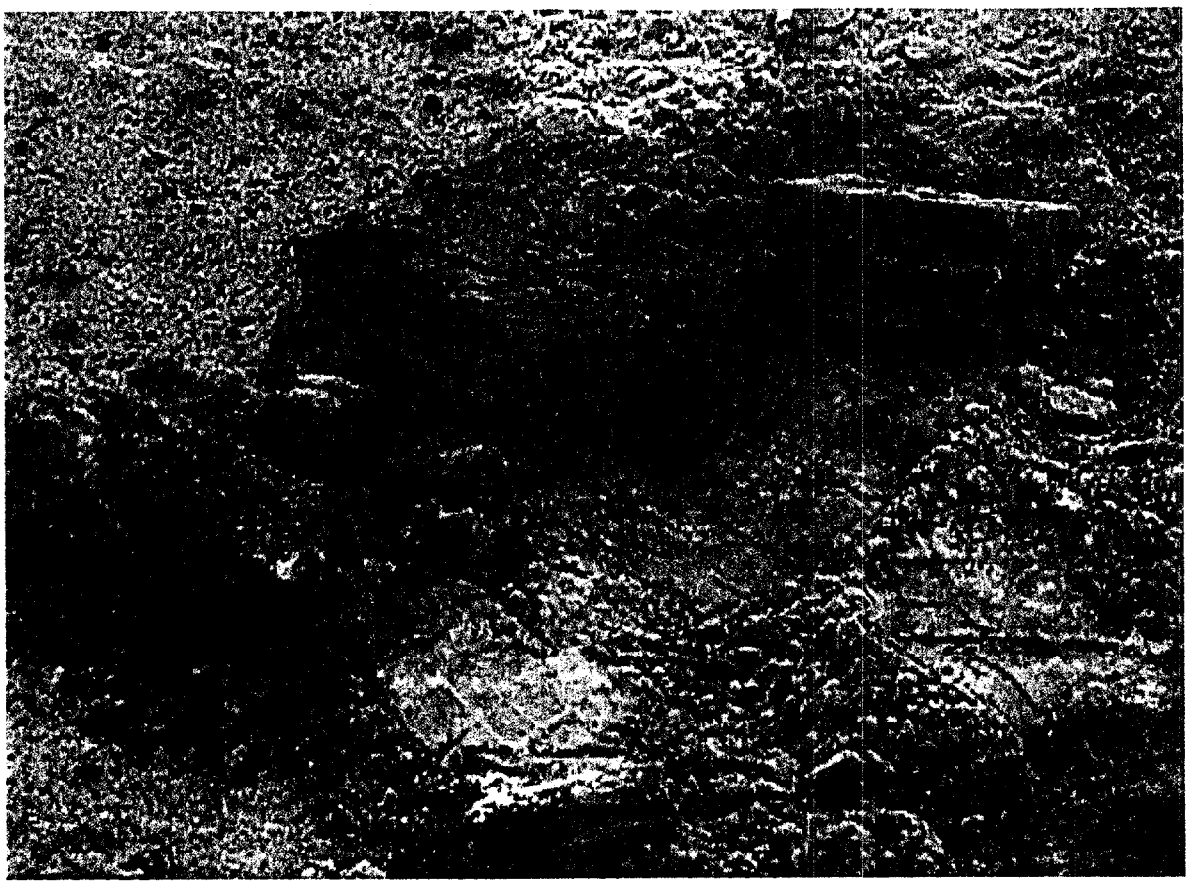
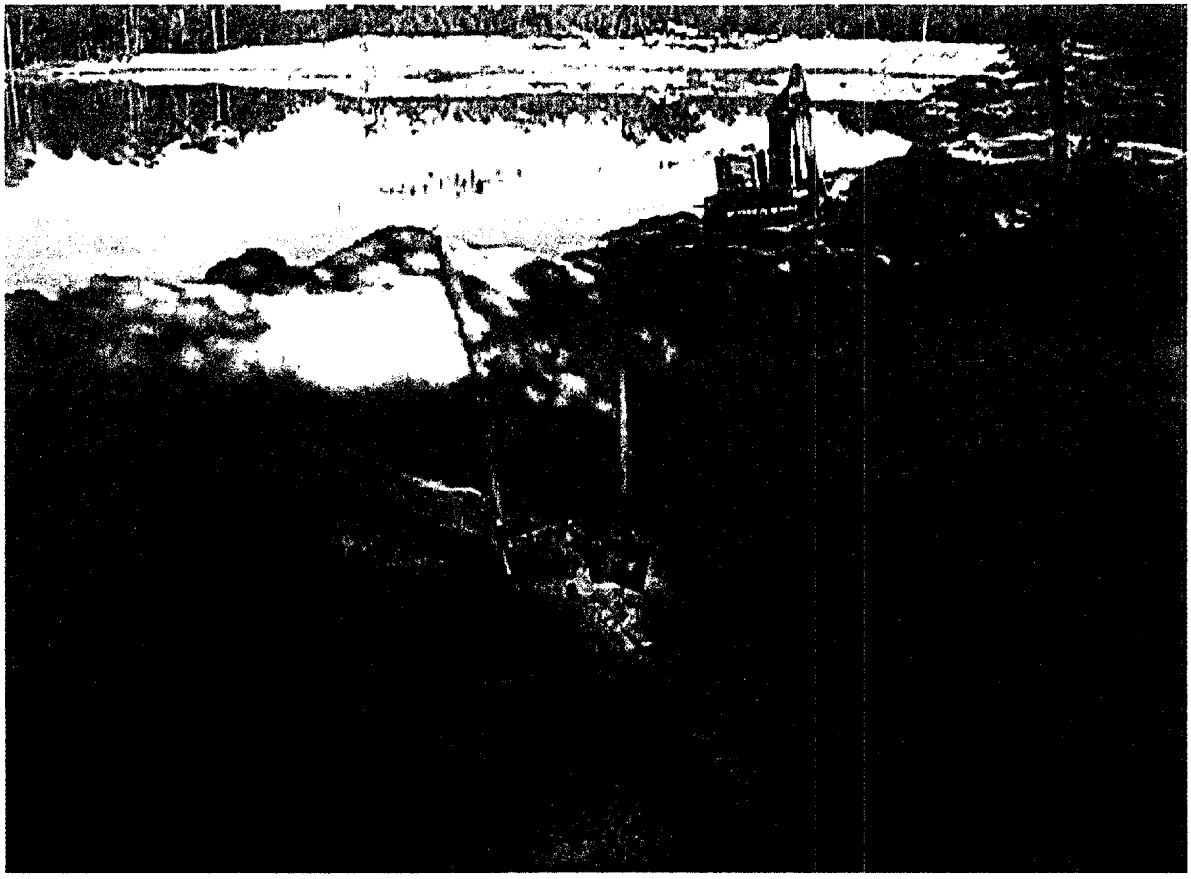
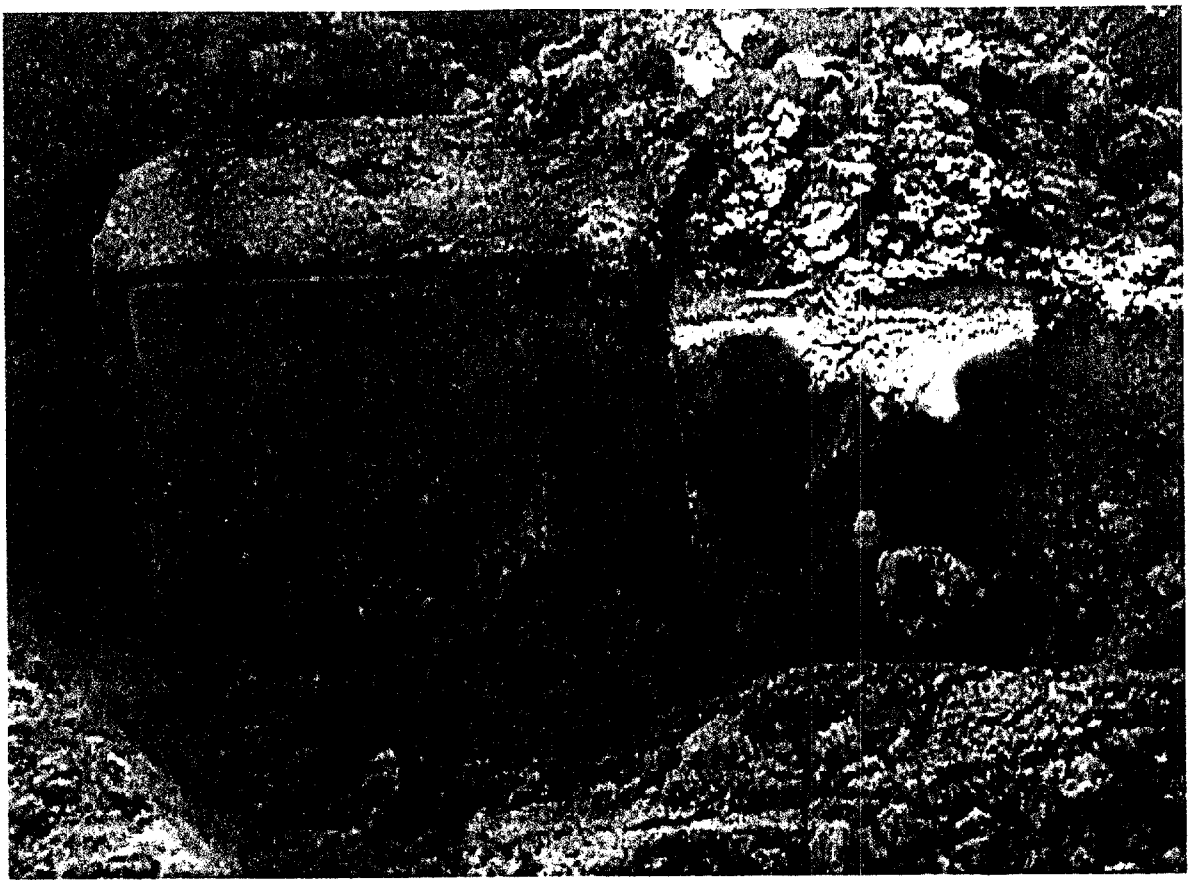


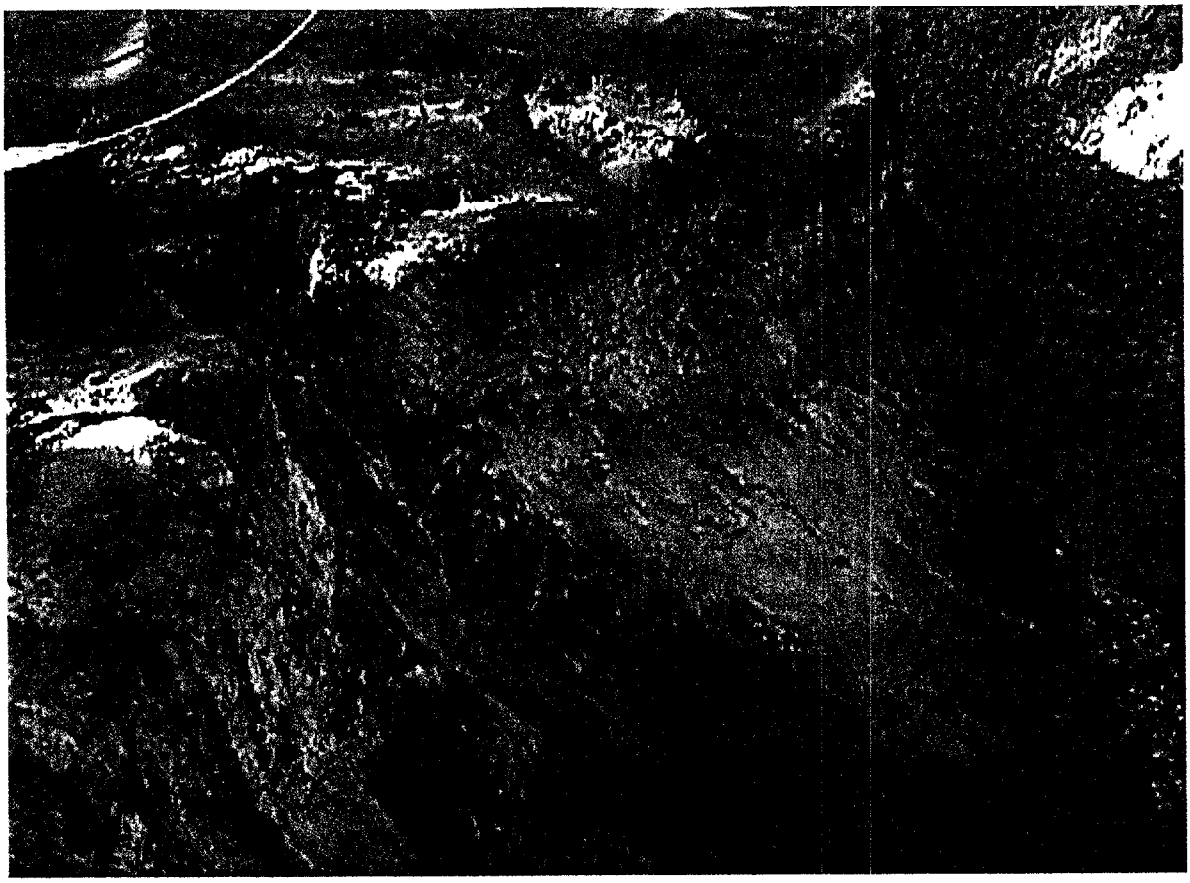
ENCLOSURE (4)



ENCLOSURE (4)



ENCLOSURE (9)



ENCLOSURE (9)

 2991

POA&M

Checklist Question POL-OIL F-14170-00000

Installation MCB CAMP LEJEUNE
Evaluation 6700100003
Type BENCHMARK/BASELINE
Inbrief/Outbrief 12/01/1998 12/11/1998

CHECKLIST QUESTION:

Upon detection of a release of used oil to the environment not subject to the requirements of 40 CFR 280, Subpart F, has the installation performed cleanup steps to stop the release, contained the released used oil, cleaned up and managed properly the released used oil and other materials, and, if necessary to prevent future releases, repaired or replaced any leaking used oil storage containers or tanks prior to returning them to service?

REGULATIONS: 40 CFR 279.22(d)(1), (2), (3), and (4)

DEFICIENCY-NUMBER/COMMAND OR TENANT/BULDING: FINDING- 1/MWR /AS114

Signs of spilling and soil contamination are present at an above ground storage tank at AS114. Dead vegetation and soil staining are present in the immediate area surrounding this tank, and the outside of the tank is covered with an oil residue. In addition, oil is present in both the overspill bucket and secondary containment portion of the tank.

NOTE: The following POL-OIL questions are applicable and have been answered as "Not Reviewed (NR)": F-14242-00000.

ROOT CAUSE TIER I: Management Emphasis

ROOT CAUSE TIER II: Personnel/activities Are Not Held Accountable For Environmental Performance.

RECOMMENDED CORRECTIVE ACTION:

1. Investigate and remediate contaminated areas surrounding the AST.
2. Clean tank exterior, remove used oil from overspill bucket and secondary containment portion of the tank, and inspect the tank to ensure it is not leaking into the secondary containment.
3. Secure cover to secondary containment compartment to prevent draining of oil into this area.
4. Implement procedure to control the manner in which used oil is placed into AST.
5. Inspect AST on a regular basis.

DEFICIENCY-INSTALLATION/COMMAND RESPONSE OR ACTION:

Tank exterior and overfill containment have been cleaned. Surrounding contaminated soils have been removed and replaced. This tank is for collection of used POLs drained from POVs by patrons of the automobile hobby shop. Procedures have been established to collect these POLs in a small portable container within the shop area, which will subsequently be emptied into the bowser by employees of the hobby shop vice patrons. This will provide better management controls.

* LOOKING TO MOVE AST INTO WASH PAD AND COMPLETE 4TH SIDE

ROOT CAUSE-INSTALLATION/COMMAND RESPONSE OR ACTION:

This area will be inspected on a quarterly basis by Command environmental personnel and appropriate follow-up actions taken, if necessary. An Environmental Compliance Plan Development project, by contractor, is currently in progress which will write site-specific management instructions on all operations, to include this one, that have the potential to impact the environment.

POA&M COMPLETION DATE: 12/18/1998 STATUS: COMPLETE

ACCOUNT NUMBERS:

HIGHER HEADQUARTERS RESPONSE:

ENCLOSURE (1)